41389/001/ 1014890v1.1

		İ
1	Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Latroya	
2	Simpson ("Plaintiff") and Defendant Vantage Hospitality Group, Inc. ("Defendant"),	
3	by and through their designated counsel, hereby stipulate and agree that the above-	
4	captioned action be and hereby is dismissed with prejudice as to Plaintiff's individual	
5	claims and without prejudice to the alleged putative class actions claims. The parties	
6	further stipulate and agree that each party shall bear their own costs and attorneys'	
7	fees associated with this action and dismissal.	
8	IT IS SO STIPULATED.	
9		
10	Dated: April 1, 2013	
11	KELLER GROVER LLP	
12		
13	By: <u>/s/ Eric A. Grover</u> Eric A. Grover	
14	Rachael G. Jung Attorneys for Plaintiff	
15	LATROYA SIMPSON	
16	LINER GRODE STEIN YANKELEVITZ	
17 18	SUNSHINE REGENSTREIF & TAYLOR LLF	>
19		
20	By: /s/ Angela C. Agrusa	
21	Angela C. Agrusa Randall J. Sunshine David B. Farkas	
22	Attorneys for Defendant VANTAGE HOSPITALITY	
23	GROUP, INC.	
24		
25		
26		
27		
28		
	Case No. 3:12-cv-04814-JST	
	STIPULATED VOLUNTARY DISMISSAL AND [PROPOSED] ORDER	

PROPOSED ORDER This action is dismissed in its entirety pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Plaintiff's individual claims are dismissed with prejudice, and the claims of the putative class are dismissed without prejudice. Each party shall bear its own costs and attorneys' fees associated with this action and the dismissal. IT IS SO ORDERED. Dated: April 1, 2013 Judge, United States District Court Case No. 3:12-cv-04814-JST STIPULATED VOLUNTARY DISMISSAL AND (PROPOSED) ORDER